

EXHIBIT A

From: [Leon, Daryl](#)
To: [Jove Java](#)
Cc: [Chinn, Lloyd B.](#)
Subject: RE: StoneX v. Shipman - CRA Deposition Information
Date: Friday, June 16, 2023 10:25:00 AM

Mr. Shipman, I am following up here.

Please let us know your position on the CRA deposition. Once you do, we will prepare and send you a draft 'joint' letter with our position included. This is what will be submitted to the Court on June 20.

Thank you,
Daryl

Daryl Leon
Associate

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From: Leon, Daryl
Sent: Tuesday, June 13, 2023 1:02 PM
To: 'Jove Java' <jovejava@yahoo.com>
Cc: Chinn, Lloyd B. <LChinn@proskauer.com>
Subject: StoneX v. Shipman - CRA Deposition Information

Mr. Shipman,

Following up from the Court conference on Monday, June 12, please be advised that Mr. Robinson's rate is \$780/hour. As discussed in Court yesterday, and pursuant to Fed. R. Civ. Pro. 26(b)(4)(E), we require an advance payment of \$6,240 (8 hours) before we can confirm Mr. Robinson's appearance. To the extent that the duration of Mr. Robinson's deposition and preparation for the deposition exceed 8 hours, we will require prompt payment of the additional fees for his time spent. If the duration of the deposition and preparation is less than 8 hours, we will promptly refund you the outstanding balance. Please confirm your agreement.

As you may have observed from your deposition, court reporters are often paid an appearance fee and per-page fee. Those rates can vary. We suggest that you contact a reporting service – two examples are [Gregory Edwards » New York](#) (the company we used for your deposition) and [Court Reporters & Stenographers | Esquire Deposition Solutions \(esquiresolutions.com\)](#) – to get an

estimate for their fees.

Mr. Robinson requires sufficient advance notice of the deposition date, but he has fairly good availability over the next month to appear for a virtual deposition. Once you confirm that you will pay his fees we can coordinate a date/time for his deposition.

Finally, the Court asked that we provide a joint letter on this subject by Tuesday, June 20. We would appreciate if you send us your position by Thursday, June 15 so that we know what you're asking from StoneX. Once you let us know your position, we will prepare and send you a draft 'joint' letter with our position included. This is what would be submitted to the Court on June 20.

Thank you,
Daryl

Daryl Leon
Associate

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